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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT,  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LISA LIBERI, et al, :  
Plaintiffs, :  
vs. : Case No.: 09-cv-01898-ECR  
ORLY TAITZ, et al, :  
Defendants. :  
\_\_\_\_\_  
:

**STIPULATED DISMISSAL WITHOUT PREJUDICE**  
**OF DEFENDANT YOSEF TAITZ**

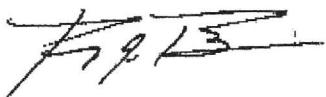
**AND NOW**, Plaintiffs, Lisa Liberi, Philip J. Berg, Esquire, Law Offices of Philip J. Berg, Evelyn Adams, Lisa Ostella and Go Excel Global and Defendant, Yosef Taitz, through their undersigned counsel hereby stipulate and agree as follows:

1. All claims against Defendant Yosef Taitz are hereby Dismissed without Prejudice.
2. Plaintiffs may apply to the Court for leave to join Defendant Yosef Taitz in this action upon satisfaction of all applicable joinder rules and leave of Court. Leave shall be granted only upon the Court's finding that Plaintiffs have established

evidence sufficient to support a cognizable claim against Defendant Yosef Taitz arising out of the allegations in the Complaint filed May 4, 2009. No application for leave to join Defendant Yosef Taitz shall be made later than sixty [60] days before the close of discovery.

3. In the event the Court grants leave to join Defendant Yosef Taitz in this action, Yosef Taitz shall be permitted to assert all defenses available to him as of the date of this stipulation, including but not limited to defenses based upon failure to state a claim and expiration of any applicable statute of limitations.
4. Defendant Yosef Taitz shall be deposed and produce documents in this action as a non-party witness.
5. Counsel for Defendant Yosef Taitz shall continue to be included on the Court's docket for purposes of receiving all filings, and shall be permitted to participate in all discovery proceedings.

**IT IS AGREED AND STIPULATED:**



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PHILIP J. BERG, ESQUIRE  
555 Andorra Glen Court, Suite 12  
Lafayette Hill, PA 19444-2531  
Attorney for the Plaintiffs'



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BRAD S. MILLER, ESQUIRE  
COOPER MORRISON & ASSOC, LLC  
325 Chestnut Street, Suite 403  
Philadelphia, PA 19106  
Attorney for Defendant, Yosef Taitz

**IT IS SO ORDERED:**

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Honorable Eduardo C. Robreno  
*United States District Judge*